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| In re POLYURETHANE FOAM ANTITRUST |) | |
| LITIGATION |) | |
| |) | |
| |) | MDL Docket No. 2196 |
| |) | Index No. 10-MD-2196 (JZ) |
| This document relates to: |) | |
| |) | |
| ALL DIRECT PURCHASER CASES |) | |
| |) | |

Defendants Carpenter Co., E.R. Carpenter Company, L.P., Carpenter Holdings, Inc., Carpenter Canada Co., Flexible Foam Products, Inc., Ohio Decorative Products, Inc., Hickory Springs Manufacturing Company and Future Foam, Inc. (collectively “Defendants”) respectfully move this Court for reconsideration of its decision rejecting their Motion to Dismiss the Direct Purchaser Plaintiffs’ Consolidated Amended Complaint (“CAC”) and Indirect Purchaser Plaintiffs’ Consolidated Amended Complaint (“ICAC” or collectively the “Complaints”), Doc. No. 191 (July 19, 2011) (hereinafter, “Order”). Alternatively, Defendants request the Court to certify its Order for immediate appeal to the Sixth Circuit Court of Appeals pursuant to 28 U.S.C. §1292(b), or to stay these civil actions pending resolution of the government investigations of the polyurethane foam industry, and to grant any further relief this Court deems just and proper.

Defendants set forth the grounds supporting this motion in the accompanying Memorandum of Law.

Dated: July 28, 2011

Respectfully submitted,

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